

**EPA INFORMATION QUALITY GUIDELINES  
PUBLIC MEETING**

May 15, 2002

***Meeting Summary***

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## **EPA INFORMATION QUALITY GUIDELINES PUBLIC MEETING**

### ***Meeting Summary***

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## Purpose

The purpose of this document is to provide a summary of the comments heard at U.S. Environmental Protection Agency's Information Quality Guidelines Public Meeting held in Washington, D.C. on May 15, 2002.<sup>1</sup> The meeting was held to give an opportunity for the public, interest groups, industries, and other organizations to provide comments on the *EPA Draft Information Quality Guidelines* disseminated on April 31, 2002. A list of attendees at the EPA Information Quality Guidelines Public Meeting can be found in *Appendix A – List of Attendees*.

Section 515 of the Treasury and General Government Appropriations Act for FY2001 (Public Law 106-554) directed the Office of Management and Budget (OMB) to issue government-wide guidelines that "provide policy and procedural guidance to Federal agencies for ensuring and maximizing the quality, objectivity, utility, and integrity of information, including statistical information, disseminated by Federal agencies." In turn, OMB issued guidelines directing agencies to develop and implement agency-specific guidelines by October 1, 2002. As a part of this process of developing and implementing agency-specific guidelines, EPA has provided for a comment session on its draft guidelines. These guidelines can be found at <http://www.epa.gov/oei/qualityguidelines/iqg-background1.htm>.

## Opening Remarks

Ms. Elaine Stanley, Director of the Office of Information Analysis and Access (OIAA) within the Office of Environmental Information (OEI), began the EPA Information Quality Guidelines Public Meeting by thanking participants for attending the meeting. Ms. Stanley then introduced Ms. Kim Nelson, Chief Information Officer (CIO), Assistant Administrator for the Office of Environmental Information.

Ms. Nelson stated the purpose of the public meeting was an opportunity for EPA to hear comments on the *Draft EPA Information Quality Guidelines*. She recognized that the EPA Data Quality Team and other EPA staff had spent many months working on the guidelines and had developed the final draft by collaborating with other program offices through an internal workgroup. Ms. Nelson indicated that as CIO, she had the responsibility for information disseminated by EPA but, this responsibility is shared with EPA's partners, other Federal agencies, Tribes, States, local communities, and the public. In order to support the basic goals of EPA – clean air, water, and protected lands – the highest quality of information must be used to provide those answers to the public and this is the ultimate goal of the information quality guidelines.

Ms. Nelson noted that EPA, like most Federal agencies, has struggled providing quality information to make the best possible decisions to support its' mission. The Agency must use this information to

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<sup>1</sup> This summary only reflects those comments presented at the May 15, 2002 public meeting and not those comments submitted electronically.

identify priorities, allocate resources to the highest priorities, and help support environmental decisions. She indicated that as these decisions become more difficult, the only way to solve problems is through good, high quality, scientific information.

Another important use of the information disseminated by EPA that Ms. Nelson addressed was its use by the public. She indicated that EPA has to constantly think about how the public uses information provided by EPA and how to provide the best information so the public can make informed decisions.

Ms. Nelson reflected on the creation of the Office of Environmental Information (OEI) in 1999 and its mission to strengthen EPA's ability to manage information resources. Although OEI has made strides in this area, she acknowledged that there is still a long way to go. Much of the information that EPA maintains comes from outdated information systems. Ms. Nelson indicated that the information quality guidelines will not fix all of those problems, but will form a foundation that gives EPA a strong springboard for moving forward and fixing those problems.

When the draft guidelines were developed, EPA realized that it had to consider the framework currently in place. Ms. Nelson referred to building on existing EPA processes, such as the strong quality system, as the path to move forward. However, she discussed how she is looking to the participants for input on how these processes could be improved.

Ms. Nelson emphasized that these are draft information quality guidelines and that the workgroup was often faced with difficult decisions and some options when determining what would work best for the public. She indicated that she is looking to participants for implementation issues and was anxious to hear thoughts, ideas for improvement, and processes for implementation. Ms. Nelson thanked everyone for their attendance and stated she was looking forward to hearing public comments.

Ms. Stanley reminded participants that the open comment period closes on May 31, 2002 and that participants are encouraged to submit comments electronically. She indicated that copies of the Federal Register were available at the registration table.

## **Public Meeting Agenda Review and Ground Rules**

Ms. Stanley spoke briefly about the public meeting agenda. She mentioned that the morning session would be an opportunity for members of the EPA Data Quality Team and senior managers to listen to prepared comments by those who registered and indicated that they would like to present comments. The afternoon is reserved for comments on specific topic areas in the draft guidelines. Ms. Stanley indicated that the meeting notes produced from the public meeting will summarize the discussion and will be posted in early June, 2002. The comments received from the public meeting, the on-line comment session, and the docket will be used to revise the guidelines and post the final version on October 1, 2002.

Ms. Stanley then introduced the other members of the panel:

- Kim Nelson, Assistant Administrator for Environmental Information and Chief Information Officer
- Richard Otis, Deputy Assistant Administrator for Environmental Information
- Mark Luttner, Director, Office of Information Collection in the Office of Environmental Information
- Evangeline Cummings, Information Quality Guidelines Workgroup Co-Chair, Office of Information Analysis and Access, Office of Environmental Information
- Jeffery Worthington, Information Quality Guidelines Workgroup Co-Chair, Office of Planning, Resources and Outreach, and Director of Quality for the Office of Environmental Information
- Barbara Pace, Senior Attorney in the Cross-Cutting Issues Law Office (CCILO), Office of General Counsel

In addition to the panel members, Ms. Stanley indicated that there were also members of the EPA Information Quality Guidelines workgroup in the audience. Ms. Stanley clarified that the role of the panel was to understand issues and not to respond directly to issues other than to get clarification on concerns. Ms. Stanley then introduced Mr. Jim Whittaker from the Marasco Newton Group as the facilitator for the public meeting.

Mr. Whittaker welcomed participants and mentioned that he is pleased to be supporting the public meeting. He reviewed the EPA Information Quality Guidelines Public Meeting folder contents outlining that it contained the following materials:

- Meeting Agenda;
- Map of meeting location;
- Lunch options;
- Biography of panelists;
- Feedback form;
- Instructions for how to submit written or electronic comments;
- OMB information quality guidelines;
- Registration list; and
- EPA Draft Information Quality Guidelines.

In terms of the agenda, Mr. Whittaker indicated that the morning was reserved for hearing comments of registrants who pre-registered. These participants will have about 10 minutes to present their comments, including time for questions from panelists. Following the eleven presenters, Mr. Whittaker indicated the public meeting will break for lunch. The afternoon discussion will be based around topics from the EPA Draft Information Quality Guidelines and participants will have the opportunity to introduce themselves and present thoughts.

Mr. Whittaker reviewed with participants ground rules for the public meeting. The ground rules were as follows:

1. In the morning, only registered speakers speak. Ten minutes are allotted per speaker.
2. An official transcript will not be produced. This is a working session to provide the EPA Data Quality Team with comments on the *Draft EPA Information Quality Guidelines*. After speakers have provided comments, they will be asked to move to the note-taking table to confirm the summary of comments.
3. Written comments should be left at the registration desk.
4. Speak clearly and loudly for the benefit of people on the phone. These participants will be able to hear the meeting but will not be able to contribute.
5. The flip chart will be used to note follow-up action items.

Mr. Whittaker then began to call those speakers who registered to present comments to the podium.

### **Presentation of Prepared Comments**

#### *Richard B. Belzer – Regulatory Checkbook*

Richard B. Belzer is the president of Regulatory Checkbook, a non-profit organization which monitors and evaluates the extent to which Federal agencies comply with requirements and guidance documents. Mr. Belzer highlighted that the *Draft EPA Information Quality Guidelines* do not reveal what EPA plans to do to implement the guidelines. He indicated that the draft is ambiguous, incomplete, and hazy on the details. Mr. Belzer maintained that the draft guidelines set forth a rough structure for the real proposal guidelines. The *Draft EPA Information Quality Guidelines* looked more like an executive summary rather than the “meat” of the document. He noted that EPA needs to publish a clear, complete and detailed draft for comment so the public can learn about the Agency’s intentions. Mr. Belzer recognized that the Agency has not had a lot of time to draft the guidelines but has had plenty of time to have better.

In general sense, Mr. Belzer commented that the draft has been crafted to lower public expectations for real change. He outlined four areas where the Draft Information Quality Guidelines needs to be improved upon:

1. **The draft takes the position that the procedures and systems in place fulfill the requirements of the law and OMB’s government-wide guidelines.** Mr. Belzer maintains that there are many instances where the guidelines can be determined to not apply to situations of the dissemination of information and undermine the importance of information quality. He also asserted that the systems in place do not necessarily support information quality.
2. **The draft excludes categories of information that may contain information that was intended to be included.** Mr. Belzer recommended that the critical test of information should be the content of information dissemination, not its form.

3. **The Agency's approach to "influential" information offers too little information to gauge how policies and procedures will ensure that "influential" information satisfies high quality standards.** Mr. Belzer highlighted that much of the important information disseminated by EPA would be exempt from being considered "influential" and these exemptions reduce the extent to which the Agency has to change its behavior.
4. **The language contained in the Safe Drinking Water Act (SDWA) should be applied for all assessments.** Mr. Belzer indicated that scientific information used for ecological risk assessment and environmental management would be exempt and the Agency does not defend the argument why the SDWA language is inappropriate for these applications.

Mr. Belzer commented on the limitations of the post-dissemination appeal procedures. He highlighted three main areas of concern:

1. The CIO and the Assistant Administrators could find themselves swamped with legitimate complaints.
2. Assistant Administrators authorized to make final decisions would have fundamental conflicts of interest because they were responsible for disseminating the original information.
3. Neither the CIO nor the Assistant Administrators can be expected to sit in judgement of a complaint about the quality of information disseminated by the Administrator or the Administrator's deputy.

Mr. Belzer recommended that EPA should aggressively design and implement a process that minimizes the number of appeals filed.

In conclusion, Mr. Belzer maintained that in the draft guidelines, EPA has provided itself too many loopholes and escape clauses. He also indicated that the *EPA Draft Information Quality Guidelines* do not go beyond what OMB requires for Federal agencies. Mr. Belzer challenged the Agency to identify areas in which it can take a leadership position among Federal agencies by doing more than the minimum.

#### *Ray S. McAllister – CropLife America*

Ray S. McAllister is the Vice President for Science & Regulatory Affairs for CropLife America, a trade association representing the manufacturers, formulators, and distributors of the technology that protects America's crops from insect pests, diseases, and weeds. Mr. McAllister focused his comments around four main points:

1. **Scope.** Mr. McAllister maintained that the guidelines should cover all activities that relate to information relied upon by the Agency for the regulation of pesticides and pesticide residues. As currently drafted, the "adjudicative process" exemption in draft Section 1.3, "What is not covered by these guidelines" could be interpreted to exempt the entire pesticide program from coverage under the guidelines.



2. **Influential Information.** Mr. McAllister commented that the proposed definition for “influential” information is far too narrow and subjective. To define “influential” information, he recommended that EPA look to the underlying public purpose of the Public Law 106-554. The statute is designed to ensure that information, with the potential to adversely impact a regulated party or the general public, adheres to the highest standard of quality. Mr. McAllister also recommends that this category of information should include scientific protocols that EPA imposes on regulated parties for the conduct of studies that are to be submitted to the Agency.
3. **Reproducibility.** In cases where public access to data and methods will not occur, Mr. McAllister commented that the Agency must be able to establish that the “robustness checks” being applied are scientifically sound and that reproducibility is being verified through independent validations. Without adequate demonstration of the quality, utility, integrity, and objectivity of the information produced by such proprietary models for use in regulation, the Agency’s decisions will continually be subject to challenge.
4. **Information from External Sources.** Mr. McAllister indicated that the guidelines must clearly establish the science-based factors to be applied by the Agency when assessing the value and reliability of third party data. He recommended that foremost among such factors should be a presumption that data submitted to the Agency and developed in accordance with good laboratory practices will supersede data from the open literature.

Ms. Barbara Pace (EPA) asked Mr. McAllister to provide clarification on his statement that the EPA exemption should be narrowed and what are the issues that would be solved. Mr. McAllister responded that he is not familiar with that process and is not prepared to address the question.

*Doug Billings – U.S. Chamber of Commerce*

Mr. Doug Billings represented the U.S. Chamber of Commerce and began his comments by applauding EPA for the public meeting process as an opportunity to voice comments. He indicated that this is a step in right direction and should improve the direction of the *Draft EPA Information Quality Guidelines*. Mr. Billings said that he will reserve most of his comments for the afternoon session but would like to provide some brief, high-level thoughts.

Mr. Billings commented that he had concerns on the definition of “influential” information because it is left to be interpreted on a case-by-case basis. Mr. Billings also expressed some concern on how EPA will use third party data, especially in regard to contractors. He stated that this is an area of the guidelines that needs some additional information. In addition, Mr. Billings indicated that the compliant process will have a great impact on the rule-making process and believed that this should be taken into consideration.

In general, Mr. Billings thought that the guidelines were vague and lacking in sufficient detail. He indicated that this is understandable to some extent given the vast amount of detail that will be included, but overall, there is a lack of detail.

Mr. Billings provided specific comments on the error correction process and areas that are not addressed in the guidelines.

1. **There is no public record that a challenge has been made to disseminated information.** Mr. Billings suggested that there should be some notification to the public when information has been challenged. He mentioned that the Department of Transportation uses an electronic docket available to the public which would be a good start for EPA.
2. **There is no discussion in the guidelines that if an error is corrected, how this information is disseminated.** Mr. Billings recommended that this process should be similar to the original dissemination of the data.
3. **There is no timeline for the review of challenged data.** Mr. Billings recognizes that different data may take a different amount of time to review. He encouraged EPA to recognize this while understanding that there needs to be some forced timeline requirement or challenged data will not be appropriately addressed.

Mr. Mark Luttner (EPA) asked Mr. Billings to make a recommendation for a reasonable timeline for review of challenged data. Mr. Billings responded that U.S Chamber of Commerce are thinking about a 30 to 60 day timeline with the acknowledgment that it could take longer. Mr. Billings indicated that the U.S. Chamber of Commerce's written comments will have more detail.

#### *Jamie Conrad – American Chemistry Council*

Jamie Conrad represented the American Chemistry Council and began his presentation by indicating that EPA is the leader in the Federal government for data quality in the creation of OEI and the central office of policy, the integration of the error process, and the use of an on-line comment period. The fact that EPA is a leader created great expectations for guidelines. Mr. Conrad indicated that the beginning of the guidelines are strong by relating data quality to the mission and strategically aligning data quality with the business of the Agency. However, Mr. Conrad indicated that the guidelines themselves either repeated what OMB wrote, deferred to future decisions, or made erroneous choices. Mr. Conrad focused his discussion around four areas in the guidelines.

1. **Applicability of SDWA.** The *Draft EPA Information Quality Guidelines* state that the Agency will adapt this guidance with minimal changes but there is no explanation of what this means. Mr. Conrad indicated that the guidelines do not specify what will be applied from the SDWA. The guidelines apply SDWA to human health assessments, but defer on environmental assessments and safety assessments. Mr. Conrad noted that this seems peculiar and at least an explanation of why environmental assessments and safety assessments were deferred should be provided.

2. **Pre-dissemination review.** Mr. Conrad commented that this is the shortest section and that it indicates that program offices will follow existing procedures but there needs to be more detail. Mr. Conrad highlighted that integrating these procedures into day-to-day processes is essential. Mr. Conrad recommended that a document distributed a few years ago titled “Lessons Learned – Information Products<sup>2</sup>” should serve as the pre-dissemination review starting point.
3. **No deadlines.** In addition to the deadlines highlighted by Mr. Billings, Mr. Conrad mentioned the need for a deadline regarding the amount of time for a correction to be made to data. Mr. Conrad also highlighted that the Assistant Administrator making the ultimate decision on an appeal is a conflict of interest. Mr. Conrad recommended that the CIO chairing a panel is a good practice but the panel should make the final decision.
4. **Are the Information Quality Guidelines binding?** Mr. Conrad indicated that the statute speaks about people being able to seek and attain information. He stated that this can only work if guidelines and the correction process is mandatory.

Mr. Conrad concluded by highlighting that the language in the guidelines is “lax” and does not require a mandatory correction process.

*Mark Greenwood – Coalition for Effective Environmental Information (CEEI)*

Mark Greenwood represented the Coalition for Effective Environmental Information (CEEI). Mr. Greenwood commented that the central issue that CEEI found with the draft guidelines was the lack of assurance that there will be effective implementation. To address this issue, Mr. Greenwood recommends that two things are needed – clear policies and effective procedures.

Mr. Greenwood highlighted that the draft guidelines rely on four policies in the Agency:

- Quality System;
- Peer Review;
- Action Development; and
- Error Correction.

He suggested that three of those policies are insufficient:

- **Quality assurance.** Mr. Greenwood asserted that this policy is not a strong basis for the guidelines because there has been uneven implementation over a number of years and this policy was cited by GAO for a lack of implementation.
- **Peer review.** Mr. Greenwood believed that these are not a big part of the overall guidelines and only give some small aspect of data quality issues.
- **Action development process.** Mr Greenwood indicated that this changes from administration to administration and is invisible from public perspective.

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<sup>2</sup> This document can be found at <http://www.epa.gov/webguide/resources/lessons.html>.

Mr. Greenwood suggested two OEI initiatives that should be implemented that could serve as a basis for effective implementation of the *EPA Draft Information Quality Guidelines*.

1. **Error correction process.** Mr. Greenwood observed that the error correction process has been effective in some cases but can be fairly slow. The effectiveness of the process relies on level of commitment from other offices (data owner). CEEI urges EPA to make the process more responsive.
2. **Information products development process.** Mr. Greenwood commented that “Lessons Learned about Designing, Developing, and Disseminating Environmental Products” lays out a six step system for developing information products and should be used as a template for managing information product development.

In addition, Mr. Greenwood indicated that effective procedures are necessary for implementation. This is especially important in regards to the correction mechanism process. Mr. Greenwood highlighted that certain laws have been effective because they have a core procedural center, whereas others have been less effective. He cited that the correction process needs to have deadlines and that many other agencies have articulated these deadlines. Also, Mr. Greenwood commented that the criteria of decisions (Section 5.5, “How will EPA respond to a request for correction of information”) are too open-ended because offices can decide not to make change due to cost, time, etc. He noted that this is sending a wrong signal to people, and is undermining the credibility of the process.

Mr. Greenwood recommended that the appeals process can also be strengthened through clarity and assuring neutrality. Mr. Greenwood believes that these things can be centralized and that some standards for presentation to the public needs to be developed.

In conclusion, Mr. Greenwood highlighted the importance of tone. He stated that the guidelines have a defensive tone with more exclusions and caveats. He asserted that the *EPA Draft Information Quality Guidelines* are an opportunity for EPA to take the Agency to a new level of service and emerge as a leader in the Federal government.

*Christopher Hornback – Association of Metropolitan Sewerage Agencies*

Christopher Hornback is the Director of Regulatory Affairs at Association of Metropolitan Sewerage Agencies (AMSA). Mr. Hornback noted that AMSA supports Agency decisions based on high-quality, validated information regarding whole effluent toxicity test methods and effluent guidelines among other issues.

Mr. Hornback commented that an added level of objective review and stricter adherence to established protocols will dramatically increase stakeholder confidence in EPA information. He indicated that the draft guidelines need more detail as to what EPA’s specific actions will be to ensure the quality of information it disseminates. Mr. Hornback noted that the current draft relies heavily on existing

procedures, systems and manuals and that the current tools for ensuring the quality of information are not adequate. He recommended that additional checks must be put in place to guarantee quality and objectivity. He also noted that while cross-referencing existing standards avoids duplicative or contradictory policies and certainly reduces administrative burdens, it does not adequately address a number of critical issues.

Mr. Hornback commented that EPA needs to clearly define the “basic standard of information quality” rather than simply restate the OMB guidelines. In addition, Mr. Hornback mentioned that insufficient information is provided on the standard of reproducibility. AMSA feels that this vital component of the guidelines must be more clearly delineated before it is incorporated into the final guidelines.

Mr. Hornback expressed concern that the Agency will make critical decisions about the reproducibility issue and other components of the guidelines following the current comment period and finalize the guidelines absent another round of public comment. He believes that another round of review is appropriate. Mr. Hornback encouraged the Agency to provide another draft of the guidelines for public review once key policy decisions have been made.

In terms of EPA’s guidelines for correcting inaccurate information, Mr. Hornback encouraged the Agency not to exclude from consideration any request for correction made in reference to EPA actions where a mechanism for submitting comments to the Agency is already provided. He highlighted that if this information is to be held to the same quality standards as is indicated in the guidelines, it must be subject to the same mechanisms for reviewing its accuracy.

In addition, Mr. Hornback commented that the Agency should not have the discretion to decide which information will be corrected based on Agency priorities, time constraints, or resources.

In conclusion, Mr. Hornback encouraged the Agency to explore a more objective and definitive process for complaint resolution.

*William G. Kelly, Jr. – Center for Regulatory Effectiveness*

William Kelly, Jr. represented the Center for Regulatory Effectiveness and commended EPA for issuing the guidelines on time, for being the only agency to hold a public meeting, and for extending consultation beyond the short comment period. Mr. Kelly focused his comments around two issues:

- What does it mean to present “unbiased” risk information; and
- What evidence is sufficient to rebut the presumption of objectivity which arises from adequate peer review.

Mr. Kelly also commented that EPA should not retain discretion to depart from the guidelines where appropriate.

Mr. Kelly indicated that EPA’s proposed guidelines do not comply with the statutory and OMB

requirements that all information disseminated to the public be “objective” and “unbiased” in regards to risks assessments. He ascertained that in the section devoted to risk assessment, the Agency distinguishes between the “substance” of the information and the “presentation” of the information. Mr. Kelly recommended that both the substance and the presentation should be unbiased in accordance with OMB.

Mr. Kelly also cited that the *EPA Draft Information Quality Guidelines* refer to the need to make “assumptions” transparent however, the Agency’s risk characterization guidance approves of the use of assumptions. Mr. Kelly maintained that risk assessments intermingle science and policy substance which misleads the public regarding the accuracy of the analysis and leads to biased science. He recommended creating two separate documents (or separate chapters) to present science and policy views.

In addition, Mr. Kelly discussed the objectivity of the Agency risk assessment peer review process. He recommended that the peer reviewers should be appraising the science, not reviewing the policy. Mr. Kelly believed the guidelines should state that failure of the Agency to follow a significant peer review recommendation would be sufficient to rebut the presumption of objectivity.

#### *Steven Koorse – Hunton and Williams*

Steven Koorse represented Hunton and Williams and noted that he has seen great improvement in the Agency’s data quality process. However, Mr. Koorse sees the need for further improvement in the data quality process and the guidelines are an opportunity for this improvement.

Mr. Koorse discussed the objectivity of data and made some recommendations to address objectivity components.

1. EPA should specify the test method it uses when disseminating information and whether or not it has been approved. If the method has not been approved, the Agency should explain why not.
2. Information should be disseminated with performance characteristics.
3. The Agency must assure that quality assurance and control has been used when information is disseminated and that the information was found to be acceptable. If the data was not acceptable, the Agency should address the data is reliable.
4. Mr. Koorse questioned the ability of the Agency to assure reproducibility unless test methods have been tested and approved by the Agency. Mr. Koorse suggested that only after a test method has been verified and tested in multiple labs can the test method be relied upon to establish reproducibility. In addition, the Agency must specify how to perform the test method or the results will vary by lab and will vary in terms of reproducibility.

Mr. Koorse exhibited discontent about exemption related to EPA’s tentative determination that it will not consider requests for correction related to data for which public comment has been solicited. He

urged the Agency to seriously consider providing for review of information, even if there was a separate opportunity for comment.

In addition, Mr. Koorse presented some thoughts about dissemination exemptions. He maintained that in regards to information provided by consultants, there is a bias against effective review because it is difficult to make changes to data after money has been invested in a major modeling effort. Mr. Koorse suggested that if the Agency knows that the information provided to consultants will be used later, it should be subject to up-front review. Mr. Koorse also stated that information given to States should not be sheltered from review

In regards to dissemination, Mr. Koorse noted that the Agency should include pre-dissemination material in review in order to avoid appeals of flawed data. Mr. Koorse encouraged the Agency to define the person to review information to include trade associations who have a member with a direct interest in an EPA decision and other Agencies.

*Kevin Bromberg – U.S. Small Business Administration, Office of Advocacy*

Kevin Bromberg represented the U.S. Small Business Administration Office of Advocacy and indicated that the EPA information quality requirements are an opportunity to enhance rule-making. Mr. Bromberg highlighted that the main point of his comment is that strong data quality rules are critical to the Agency because they are important to good science.

Mr. Bromberg cautioned that the Agency should be more cautious with the exemption criteria and that EPA should be mindful of the scientists, not the lawyers. Mr. Bromberg noted that the data quality requirements are not different in kind from other institutional protections such as peer review requirements that are difficult to follow but provide insulation to the agency from political interference. Mr. Bromberg indicated that a peer review process similarly has value to EPA and to the rule-making process.

Mr. Bromberg noted that small businesses benefit when EPA follows standards. He cited an example of how resources could be saved if EPA were required to follow sound science and would make a difference in the regulatory results.

Mr. Bromberg focused the remainder of his comments around three areas:

1. **Third party information.** Mr. Bromberg indicated that third party information should be subject to the same requirements used for EPA-developed information in rule-makings.
2. **Correction Process.** In addition, Mr. Bromberg pointed out discrepancies in the definition of “affected parties” and recommends that EPA explicitly state the data users are included within the definition of those benefit from the information. Only “affected parties” can ask for corrections. Such affected parties should include governmental and other organizations. Mr. Bromberg maintained that rule-making decisions should not be excluded from correction

process. He cited that new information is available frequently and rules may need to be altered to reflect this new information.

3. **Peer review.** Mr. Bromberg noted that there is not a great amount of information about peer review in the draft guidelines. He noted that EPA should include in the information an explanation of whether the information went through peer review and if not, the reasoning.

#### *Sean Moulton – OMB Watch*

Sean Moulton represented OMB Watch and commented that the Agency's efforts have been light and defensive in tone. He recognized that EPA is leader in data quality and has a commitment to public access. Mr. Moulton mentioned that he was pleased by the defensive tone in guidelines because EPA has many policies and procedures in place that are appropriate and implementing others will lead to a delay.

Mr. Moulton noted that he was encouraged by the fact that EPA has reserved the right to part from guidelines. He recognized that EPA needs to sometimes make decisions on incomplete data. Mr. Moulton agreed with the EPA decision to adapt and not adopt the SDWA for risk assessments.

Mr. Moulton commented that the following changes to the guidelines could be made:

- Provide more opportunities to safeguard itself from unnecessary efforts that will bog down the process (specifically in regards to administration); and
- Clearly define "affected persons".

Mr. Moulton commended EPA on the definitions of dissemination. He also felt that the examples of influential information were strong. Mr. Moulton suggested including a time restraint on those requesting error correction. He noted that the Department of Transportation (DOT) included in its guidelines a one year limit for error correction after the original dissemination of information.

Additionally, Mr. Moulton indicated that OEI should play a more central role in handling requests and appeals. In regards to the appeal process, he suggested that the final decision should come to OEI and not to the program offices.

Mr. Moulton closed by saying that EPA should to take every opportunity to safeguard itself against efforts to manipulate data quality guidelines that will result in additional burden to the Agency.

#### **Public comment by topic area**

Mr. Whittaker began the afternoon session by reminding participants that the meeting summary will be available on-line at [www.epa.gov/oei/qualityguidelines](http://www.epa.gov/oei/qualityguidelines). Mr. Whittaker stated that the afternoon session was dedicated for comments on specific topics that the Information Quality Workgroup highlighted. Mr. Whittaker then reviewed the topic areas and the specific questions the workgroup indicated for each area. The questions and topic areas can be found in *Appendix B – Meeting Agenda*.



## **Influential Information**

Five attendees presented comments on the topic of influential information.

### *Mark Greenwood – Coalition for Effective Environmental Information (CEEI)*

Mr. Greenwood highlighted two elements of the OMB definition for influential information – public policy and private sector decisions. In regards to public policy, Mr. Greenwood indicated that there needs to be an impact test on the influential nature of information and its impact on public sector decisions. He also commented that the guidelines tend to focus on the form of the information rather than the content. Mr. Greenwood recommended that EPA identifies the content and asks whether the content has an impact.

Ms. Stanley (EPA) asked Mr. Greenwood for a suggestion as to how to measure unknown impacts. Mr. Greenwood replied that when characterizing a facility or products, there can be an assumption of who will be impacted. He indicated that the correction mechanism will be a good test because EPA can begin to understand what information is important. In addition, Mr. Ortiz (EPA) asked Mr. Greenwood if he could quantify the impacts ahead of time and Mr. Greenwood responded that it is a categorization with a case-by-case break out and that individual parties can make information influential.

### *Charles Brown – National Association of Homeowners*

Mr. Charles Brown commented that he observed a link between the peer review process and influential information. He indicated that the peer review process should determine when data is influential. Mr. Brown believed that information should be reviewed by scientific peers or experts. Mr. Brown also noted that documents should go through an internal peer reviewed internally, not an external peer review. This will guarantee that influential information has been looked at in a scientific context. In addition, Mr. Brown stated that statistical information should be classified as well. Mr. Brown highlighted that information that is not influential today could be used to set policy five to ten years from now.

### *Glen Barrett – American Petroleum Institute*

Mr. Barrett maintained that influential information should include all information used to support Agency actions, not just environmental information. He indicated that EPA's definition of influential focuses on what is important to EPA rather than what is important to the public, regulated community and others. Mr. Barrett suggested that EPA should consider the type of information versus the quality of information when defining influential information.

Mr. Luttner (EPA) asked Mr. Barrett to clarify if all the information disseminated by the EPA is influential and Mr. Barrett responded that it was. Mr. Luttner questioned this answer in regards to public filings and subpoenas. Mr. Barrett maintained that the guidelines should include additional information as influential.

Mr. Barrett continued that all EPA information should be covered by the guidelines. This should include any EPA summaries, analysis, and data that EPA packages to the public. Mr. Barrett suggested that EPA should limit exclusions of influential information to individuals, not organizations.

*Richard B. Belzer – Regulatory Checkbook*

Mr. Belzer highlighted that in regards to influential information, the approach taken by EPA is not appropriate because it places information into categories rather than examining content. He maintained that any approach to determine if information is influential should be content rather than form focused. Mr. Belzer recommended that the Agency looked at union of due concepts - motive and content. Any information that EPA disseminates that effects behavior should be covered by the guidelines.

Mr. Belzer also mentioned his concern regarding the peer review process for large documents where the peer review process may not adequately be able to review the document. He maintained that the burden on EPA is the same if the information is low or high quality. This burden has a perverse effect on the ability to use high quality information. Mr. Belzer indicated that there is a potential risk that high quality information will be set aside because it is harder to justify its use.

Mr. Belzer recommended that EPA take into account other agencies information quality guidance, definitions, issues, comments, guidance, processes and consult with them in an attempt to eliminate inconsistency. He challenged the Agency to create incentives for people to provide high quality information.

Mr. Otis (EPA) asked Mr. Belzer how EPA should deal with information that has no motive to change behavior but has a significant effect. Mr. Belzer responded that this type of result puts into question the Agency's effectiveness and accountability. Mr. Belzer recommended that information disseminated for that intent should be in a category of information similar to press releases.

*Doug Billings – U.S. Chamber of Commerce*

Mr. Billings commented that the definition for influential information did not focused on private sector decisions which is a key factor in determining what is influential. He suggested that the monetary limit is appropriate but the \$100 million limit is too high. Mr. Billings believed that there should be a narrative description to balance the monetary threshold.

Mr. Billings also maintained that rule-making information should be considered influential. Mr. Billings' final point was that the definition of influential information needs to be descriptive in order to provide program offices with a process to ensure effective implementation.

Ms. Cummings (EPA) asked Mr. Billings if he had a suggested monetary figure. Mr. Billings responded that the strict monitoring number is difficult to incorporate so a narrative description can be used to explain what is influential information.

## **Reproducibility**

One attendee presented comments on the topic of reproducibility.

### *Richard B. Belzer – Regulatory Checkbook*

Mr. Belzer commented that access to data is the most fundamental principle of the Regulatory Checkbook. He indicated that there is a need to provide access to data and models that EPA is using and without that access it is impossible to verify that EPA is using quality information. Mr. Belzer maintained that all models need to be disclosed with documentation and if this does not happen, reproducibility can not be demonstrated.

Mr. Belzer suggested that EPA limit the use of the exclusion for robustness checks. He cited the example of using anonymous data which can still be provided for public use. Mr. Belzer commented that he would like to see robustness checks done more often and they can be built into the analysis of data. He suggested limiting robustness checks except when data cannot be provided.

Ms. Stanley (EPA) asked Mr. Belzer to clarify that if data cannot be disclosed, then the Agency should not use it. Mr. Belzer commented that it is difficult to imagine a situation where EPA is going to take an action based on information that cannot be made public. Mr. Belzer questioned why EPA would want to exclude a model from public scrutiny.

Mr. Luttner (EPA) questioned Mr. Belzer's comment that if the model is not public domain then EPA should not use it. Mr. Belzer clarified that in order to maximize reproducibility, models need to be available to the public and there should only be specific situations where the model is not provided and these should be justified.

## **Influential Risk Assessment**

Three attendees presented comments on the topic of influential risk assessment.

### *Alan Roberson – American Water Works Association*

Mr. Roberson commented that the American Water Works Association has been very active in doing analysis on EPA's rule-making for water and noted that the models rarely come with documentation. In terms of reproducibility, Mr. Roberson noted that the references often lead to a dead-end and are inconsistent which leads to problem in doing the analysis.

Mr. Roberson indicated that in addressing the risk assessments, it would be a good idea for EPA to adapt the SDWA principles because they are helpful in explaining rule-making decisions to consumers.

### *Mark Greenwood – Coalition for Effective Environmental Information (CEEI)*

Mr. Greenwood highlighted that the guidelines argue the wrong issue in regards to adopting or adapting the SDWA principles. SDWA establishes a set of general principles and guidance on how to do an assessment. Mr. Greenwood questioned why this would not be done for the Agency. He noted that SDWA should apply across the board at the Agency and the guidelines should identify rare cases where it would not apply.

*Sean Moulton – OMB Watch*

Mr. Moulton pointed out that EPA noted in its approach to adopt or adapt SDWA that there are two principles - best available peer review and best information available at the time. Mr. Moulton noted that some information may not be the best scientific evidence. Mr. Moulton's second point was that these principles are noted by EPA to be equal which is a good approach because if data is collected by an acceptable method but is not peer reviewed, EPA can still disseminate the information.

### **Sources of Information Disseminated by EPA**

Five attendees presented comments on the topic of sources of information disseminated by EPA.

*Steven Koorse – Hunton and Williams*

Mr. Koorse commented on EPA's oversight for State decisions and the necessity of States to make decisions on quality information provided by EPA. Mr. Koorse maintained that it is Congress's intention to ensure that EPA is in a position to be an expert by obtaining information from the States and create a standard of quality. Therefore, it is important that EPA maintains a standard of information quality that States can use. Mr. Koorse also maintained that because Congress provided for EPA oversight, EPA has a responsibility to create a uniform level of quality. In reference to the specific factors EPA should use, Mr. Koorse recommended that EPA should use the same factors that govern the review of its own decisions.

Mr. Koorse stated that with third party information (specifically States), when look at pre-dissemination review, EPA should look in broader context. Specifically, EPA should communicate with States so they know in advance what standards the Agency will apply. In addition, Mr. Koorse recommended that States should provide a data quality plan in advance of allocating grant funds. He noted that the Agency needs to give States the flexibility to make decisions but at the same time, maintain responsibility to ensure data quality, communication standards and requirements.

*Charles Brown – National Association of Homeowners*

Mr. Brown noted that EPA is the leading source of experts for science information and that good science is always peer reviewed. He noted that information that is published should be peer reviewed by experts or the agency that has the largest group of scientists in that category.

*Glen Barrett – American Petroleum Institute*

Mr. Barrett recommended that internal information in the Agency should be reviewed through the same assessment factors used for information from external sources. He suggests that the Agency could

assess the quality of its information using a 2-tiered matrix. The matrix would categorize the type of information versus the quality of information on a scale (e.g., A - excellent, E - bad). Mr. Barrett recommend that the data should be ranked during the pre-dissemination process.

*Richard B. Belzer – Regulatory Checkbook*

Mr. Belzer commented that the Society of Risk Analysis would enjoy consulting with EPA about how to rank and evaluate scientific information.

*Doug Billings – U.S. Chamber of Commerce*

Mr. Billings noted that in reference to third party data, the transparency issue could be addressed if models could be published. He recommends that propriety models should be “dis-favored” whenever possible so EPA can show the maximum amount of transparency.

Mr. Billings also stated that it is an excellent idea to create guidelines for information that tells voluntary providers of information standards for data quality. He stated that guidelines that inform others of how to provide the best information possible would be welcome.

Mr. Luttner (EPA) stated that the situation of third party data happens frequently in rule-making decisions. He mentioned that data is not included many times because it is not reproducible. Mr. Luttner asked if he had further comments on how to address this in the guidelines. Mr. Billings responded that disseminating the data will provide equal opportunity for those with comments.

## **Complaint Resolution**

Seven attendees presented comments on the topic of complaint resolution.

*Sean Moulton – OMB Watch*

Mr. Moulton commented that he would like to see OEI take a more central role in resolving complaints on information. He noted that the initial process of handling complaints to data owners is best handled by those familiar with the issue. However, in providing the most beneficial response on the appeal, it might be more objective for OEI to play the lead role. Mr. Moulton believed that the appeal process may focus on issues that are not programmatic but more related to use. In these instances, OEI would be more knowledgeable about rules and regulations.

In terms of responding to complaints, Mr. Moulton noted a 30 day standard among most agencies for a response or to give explanation of why the research may take longer. He also commented there should be a time period for complainants making an error correction request.

Mr. Otis (EPA) asked how other Agencies are treating the central role of the CIO. Mr. Moulton responded that he did not know. He has looked over broader details, but he cannot recall other than that some of the other Agencies are centralizing the complaints more so than EPA.

Mr. Luttner (EPA) asked Mr. Moulton about the soundness of the legal basis for having a year after the information disseminated time limitation. Mr. Moulton replied that given that EPA has asserted the scope of these guidelines is limited in the legal fashion, setting up a timeliness requirement is simply a guideline that the Agency has the opportunity to follow.

*Charles Brown – National Association of Homeowners*

Mr. Brown noted that all data time is incorrect should be corrected or some caveat should be given in the file that states that “you are using this data at your own risk.” Mr. Brown questioned the practice of keeping uncorrected data in a data set that is classified as a good data set. He believed that all incorrect data needs to be corrected or specified that data is incorrect. He also indicated that no timeline should be place on the correction of incorrect data.

*Mark Greenwood – Coalition for Effective Environmental Information (CEEI)*

Mr. Greenwood commented that OEI needs to play a central role the appeals process because information quality is a cross-cutting issue. He highlighted the importance of having a centralized office to step in and make Agency-wide decisions.

In regards to deadlines, Mr. Greenwood supported the thought that there should be deadlines for correcting information. He suggests different kinds of data corrections. One type may not have a very long process for those things that could be dealt with in a few weeks. The other correction could be for interpretive questions that could demand longer timeframes.

Mr. Luttner (EPA) noted that he appreciates Mr. Greenwood’s notice of the sensitivity of OEI playing the central role and asked him if he has any suggestions. Mr. Greenwood suggested appreciating the sensitivity of program offices and using the information quality guidelines as a guide.

Ms. Stanley (EPA) asked Mr. Greenwood if he had any thoughts on the retroactivity of error correction. Mr. Greenwood noted that there is a point where EPA should not be required to fix data. However, Mr. Greenwood recognized that there are secondary uses for data (e.g., data that was used for one reason, is now being used for another). He suggested that if data is moved to a new use and is now considered influential, EPA may need to provide the ability to correct data.

*Doug Billings – U.S. Chamber of Commerce*

Mr. Billings commented that bad data should generally be corrected and suggested that if the person who brings a complaint is not an affected person, the Agency could choose not to correct the data. In addition, Mr. Billings noted that if there is bad data in a rule-making decision, the earlier this can be corrected, the better. He supported the idea that information should be examined earlier in the process rather than later.

Ms. Stanley (EPA) asked Mr. Billing how far back he would recommend extending the error correction process. Mr. Billings indicated that there is a cost associated with extending the error correction process which needs to be understood and considered

*William G. Kelly, Jr. – Center for Regulatory Effectiveness*

Mr. Kelly commented that with the use of the Internet, sensitivity to time is extremely important in the error correction process. He noted that inaccurate data on a Web site can cause many problems and that the guidelines should address what to do to data that is submitted in the error correction process such as removing the information or providing a notice. Another option Mr. Kelly suggested is listing all petitions of data that are under review so people know what challenges have been submitted.

Mr. Kelly indicated that other Agencies handle the error correction process by having the CIO consult with the program office and to come to agreement about the data. The CIO coordinates, oversees, and ensures completion of issue. Mr. Kelly cited that the problem with this process is that bad information is not removed while that process is going on and he believes this is necessary.

Mr. Luttner (EPA) suggested that upon notice of suspected errors, a flag is put on that data without an explanation. Mr. Kelly responded with two options – a flag might be appropriate or the CIO works with the program office and determines immediately if there is a problem that will take a while to be revised. In this instance, the data can be marked further than adding a flag.

*Richard B. Belzer – Regulatory Checkbook*

Mr. Belzer noted that the error correction process proposed in the guidelines relies on the information owner who has little incentive to be responsive. He recommended a body of experts who would review error correction submissions and would be accountable to OEI. The panel would provide the basis for making a decision.

*Jamie Conrad – American Chemistry Council*

Mr. Conrad commented that there should not be a limitation to the amount of time that exists to make comments on data because it undermines the goal of quality of information. He noted that if there is a timeframe associated, it should be no shorter than the statute of limitation associated with that data.

Mr. Conrad highlighted another complicated factor – that data may be correct when disseminated but become incorrect later when additional information is disseminated. He stated that the Agency should make the decision to receive error corrections based on if the Agency still uses the information. If the data is not used, Mr. Conrad suggested that it be archived and if it is brought back in to the decision making process, then it should be re-evaluated as to whether it should be corrected.

### **Additional Issues**

Mr. Whittaker indicated that the comments provided covered a lot of ground and asked if anyone had any other issues.

Mr. Greenwood noted two orphans in terms of the OMB guidelines requiring objectivity, integrity, utility in the draft guidelines. He commented that integrity should articulate security related issues and policies in the guidelines. In addition, Mr. Greenwood indicated that utility should be used appropriately. He also stressed the importance of preparing information for an audience and understanding the information needs of the audience, so that data is appropriate.

In addition, Mr. Whittaker noted the following action items during the public meeting:

1. Identify other Agency guidelines that can serve as a benchmark for EPA;
2. Make current version of risk characterization guidance publicly available on-line (During the meeting, the Web site was noted to be: <http://www.epa.gov/osp/spc> ); and
3. Go to meeting summary at <http://www.epa.gov/oei/qualityguidelines> .

### **Closing Remarks**

In closing the public meeting, Mr. Luttner thanked everyone for participating. He highlighted that the drafting of the guidelines has been a tough process with a short timeline. He asked that attendees provide written comments if they have not done so already. Mr. Luttner reviewed the schedule for producing the final guidelines by October 1, 2002. He noted that EPA will continue its consultation with scientists, States and other communities.

Mr. Otis highlighted the level of dedication and attention placed on the guidelines. He shared his belief that the public has a right to understand how decisions on error correction have been made. Mr. Otis stated that he looks forward to receiving written comments and highlighted that EPA takes the guidelines and comments very seriously. He again thanked everyone who participated.



# **EPA INFORMATION QUALITY GUIDELINES PUBLIC MEETING**

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## ***Appendix B – AGENDA***

### **US Environmental Protection Agency Public Meeting**

#### **Draft EPA Information Quality Guidelines**

**May 15, 2002, 9:00 - 4:30pm**, EPA East Building: formerly the Interstate Commerce Commission Building (ICC), 1201 Constitution Avenue, NW, Room 1153, Washington, D.C

*Please note: The time for the afternoon topic discussions may be reduced to accommodate additional speakers who wish to present prepared comments.*

**9:00 - 9:20am**

#### **Introductions of the EPA panel**

Elaine Stanley, Director, Office of Information Analysis and Access, Office of Environmental Information, US EPA

#### **Opening Remarks**

Kim Nelson, Chief Information Officer, Assistant Administrator for the Office of Environmental Information, US EPA

**9:20- 9:30am**

#### **Public meeting agenda review, ground rules**

*Facilitator: James Whittaker, Marasco Newton Group*

**9:30 - 12:00pm**

#### **Presentation of prepared comments by members of the public**

*12:00 - 1:00pm*

*Lunch break*

**1:00 - 3:30pm****Public comment by topic area:**

*Moderated by facilitator: James Whitaker, Marasco Newton Group*

### **Influential Information** *(time allotted: 30 minutes)*

“Influential,” when used in the phrase “influential scientific, financial, or statistical information,” means that the Agency can reasonably determine that dissemination of the information will have or does have a clear and substantial impact on important public policies or important private sector decisions. Consistent with OMB’s guidance, EPA has chosen to identify influential information in terms of specific classes of information that are developed and reviewed through Agency-wide processes.

- Is this an appropriate approach?
- Is the scope of information too broad?
- Are there other classes of information that should be included?

EPA intends to develop experience implementing its definition of influential information over the first year, and then potentially broaden it to incorporate other classes of information disseminated by EPA.

- Is this an appropriate approach and consistent with the goal to continually improve Agency information?

### **Reproducibility** *(time allotted: 30 minutes)*

Influential scientific, financial, or statistical information generally has a higher degree of quality, in particular, transparency that facilitates the reproducibility of the information by qualified third parties.

- What comments do you have on the Agency’s approach to facilitating the reproducibility of influential information?
- Is it appropriate for the influential scientific, financial, and statistical information EPA disseminates?
- What types of original and supporting data do you believe should or should not be subject to a reproducibility requirement given ethical, feasibility, or confidentiality constraints?
- What suggestions do you have for performing and reporting robustness checks of influential analytic results in cases where public access to data and methods will not occur due to other compelling interests such as privacy, trade secrets, intellectual property, and other confidentiality protections?
- In particular, how might such robustness checks be applied to third party data that are used in analyses included in influential scientific, financial, and statistical information disseminated by EPA?

### **Influential risk assessment** *(time allotted: 30 minutes)*

EPA has adapted the SDWA quality principles for influential scientific risk assessments regarding human health risks and would like to hear from you on this issue.

- What suggestions do you have with respect to the EPA adaptation of the SDWA principles for influential scientific risk assessments regarding human health risks?
- Do you think that an adaptation of the SDWA quality principles is appropriate for most influential scientific risk assessments regarding human health risks disseminated by EPA?

EPA has decided to adapt the SDWA quality principles in the future for environmental and safety risk assessments. This will enable EPA to inform its decisions on how to best address this issue based on public input.

- What suggestions do you have for how EPA should address environmental and safety risk assessments?
- How do you think EPA should adapt the SDWA principles to accommodate these different risk assessments?
- Or, if you do not believe that EPA should adapt these principles, how would you suggest EPA address environmental and safety risk assessments in its quality guidelines?

### **Sources of Information Disseminated by EPA** *(time allotted: 30 minutes)*

During the development of these guidelines, EPA considered how to address information that is not generated by the Agency, but is later disseminated by EPA in a publication or through a regulatory or policy decision. Although this information may not be covered by these guidelines when it is first generated by outside sources, it may be covered by the guidelines if the Agency subsequently decided to use the information in a publication or policy decision.

- EPA would like you to suggest specific assessment factors that the Agency should consider using when assessing specific kinds of information submitted to EPA by outside sources, or information EPA obtains from outside sources.
- EPA also requests your input on how it should properly consult with the scientific and technical community in establishing these assessment factors.

### **Complaint Resolution** *(time allotted: 30 minutes)*

EPA has developed a complaint resolution process. That is, your initial complaint would be heard by what EPA calls the "information owner". That "information



owner" is the EPA person designated by management in the EPA program, or who has the responsibility for the quality, objectivity, utility and integrity of the information disseminated by EPA. Next, should you appeal the initial decision, your appeal would be heard by the Assistant Administrator (AA) or Regional Administrator (RA) for that program or region. The AA and RA are the highest ranking official for those organizations. They are political appointees. That appeal would be decided in collaboration with a standing panel. That panel would consist of other AAs and RAs to ensure that your appeal is taken to a most senior level right away. The EPA Chief Information Officer would chair that panel. There are many more details that EPA has yet to decide and the Agency encourages your input as it develops this proposal.

- Specifically, what suggestions do you have regarding the receipt of the initial complaint through the Office of Environmental Information? Do you think a central point of entry is useful or problematic?
- What are appropriate time periods for this process?
- Once an appeal is submitted it would be decided by a top EPA official in collaboration with an executive panel. Do you think this is sufficiently objective and efficient to ensure a timely and appropriate response to an appeal?

**3:30 - 4:00pm      Other issues for discussion**

**4:00 - 4:30pm Closing remarks and meeting follow up by EPA**

*Elaine Stanley, US EPA, Director, Office of Information Analysis and Access, Office of Environmental Information*

## EPA INFORMATION QUALITY GUIDELINES PUBLIC MEETING

### *Appendix C – Feedback Form Results*

A total of 74 people attended the EPA Information Quality Guidelines Public Meeting on May 15, 2002. Six out of these 74 attendees submitted their feedback forms provided in the meeting materials folder. The information provided below is a copy of the feedback form provided to registrants. In the response areas to the questions, the number of people who responded that specific way and the percentage of the total people who responded is provided.

Please place an (X) under the response which best describes your opinion.

	Strongly Agree	Agree	Undecided	Disagree	Strongly Disagree
1. The keynote speech was appropriate and informative.	3 (50%)	3 (50%)			
2. There was adequate time for presenting comments.	5 (83.3%)	1 (16.7%)			
3. The meeting agenda was helpful in framing the issues for the public meeting.	3 (50%)	3 (50%)			
4. The public meeting was a good use of time.	4 (66.7%)	2 (33.3%)			
5. The materials/handouts were valuable.	4 (66.7%)	2 (33.3%)			
6. The meeting space was comfortable.	2 (33.3%)	3 (50%)		1 (16.7%)	

Please complete the following sentences:

1. The most helpful information I received at the EPA Information Quality Guidelines Public Meeting was (and why?):
  - Interaction with other commenters
  - The discussions on each topic area
2. I need more information about:
  - What EPA intends to do
3. Overall, I thought the EPA Information Quality Guidelines Public Meeting was:
  - Helpful and constructive, especially EPA staff willingness to listen

- Excellent
- Extremely beneficial to other Agencies who are developing their guidelines as well. We got to hear public comments about what they expect in Agency guidelines.
- Very thorough and informative

4. Additional Comments:

- Bad acoustics
- I think this was extremely beneficial to both the public and to other Agencies who are writing up their guidelines as well.